

NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. : MARCH 29, 2022

NO. X-06-UWY-CV18-6046437-S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
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**MOTION ON CONSENT FOR
COMMISSION TO TAKE OUT-OF-STATE DEPOSITION**

Pursuant to Conn. Gen. Stat. § 52-148c(b) and Connecticut Practice Book § 13-28(a), the plaintiffs with the consent of all parties respectfully request that this Court grant a Commission to a competent authority, in the form attached hereto as Exhibit A, to issue or cause to be issued a Subpoena *Duces Tecum*, compelling testimony and production of documents from Rob Dew. The proposed Subpoena and accompanying production requests are attached hereto as Exhibit B.

I. BACKGROUND

The Court is well aware of the allegations set forth in the operative complaint. Defendant Free Speech Systems, Inc. (“FSS”), a media company operating in Austin, Texas and controlled by defendant Alex Jones, is one of the corporate loci of the unlawful conduct alleged in the

complaint. FSS current and former employees and others who possess relevant information are located in the greater Austin area. This Court has already held that FSS employees and former employees who are not “officer[s], director[s], or managing agent[s]” within the scope of Practice Book § 13-26 may be compelled by subpoena. *See* DN 343.10 (“The Riley deposition may go forward, but by subpoena.”).

II. LEGAL STANDARD

The Practice Book provides that discovery “shall be permitted” whenever it is “material to the subject matter involved in the pending action,” “would be of assistance in the prosecution or defense of the action,” or is “reasonably calculated to lead to the discovery of admissible evidence.” P.B. § 13-2. This provision “liberally permits discovery of information material to the subject matter involved in the pending action.” *Lougee v. Grinnell*, 216 Conn. 483, 489 (1990), *overruled in part on other grounds by State v. Salmon*, 250 Conn. 147, 154–55 (1999). Under this standard, a plaintiff is entitled to “take the testimony of any person. . . by deposition upon oral examination.” P.B. § 13-26, so long as the testimony is material to the action or would assist in its prosecution, P.B. § 13-2.

This legal standard is applicable to witnesses located outside of Connecticut: P.B. § 13-28 and Conn. Gen. Stat. § 52–148c create a mechanism by which a party can apply to the Connecticut court for a commission to take the deposition of an out-of-state witness.¹ *See* P.B. § 13-28 (“In any other state . . . depositions for use in a civil action . . . within this state shall be taken before . . . a person commissioned by the court before which such action or proceeding is pending . . .”); Conn. Gen. Stat. § 52–148c (same).

¹ Connecticut is not among the 41 signatories of the Uniform Interstate Depositions and Discovery Act (UIDDA). 16:16, Foreign Discovery, Trawick, Fla. Prac. & Proc. § 16:16 (2019-2020 ed.).

“Once the commission is granted by the court in this state, a subpoena can be obtained in the proposed deponent’s state to force the deponent to attend a deposition in his state.” *Struckman v. Burns*, 205 Conn. 542, 552 (1987); *see also Millium v. New Milford Hosp.*, 310 Conn 711, 719 n.7 (2013) (same); *Rhode v. Milla*, 287 Conn. 731, 743 (2008) (same); *Noll v. Hartford Roman Catholic Diocesan Corp.*, 2008 WL 4635591, at *2 (Conn. Super. Sept. 26, 2008) (Shapiro, J.) (same); *Cassinelli Bros Const. Co v. Gray*, 1996 WL 278330, at *1 (Conn. Super. May 9, 1996) (Hickey, J.) (same).

Texas R. Civ. P. 201.2 provides:

If a court of record of any other state or foreign jurisdiction issues a mandate, writ, or commission that requires a witness’s oral or written deposition testimony in this State, the witness may be compelled to appear and testify in the same manner and by the same process used for taking testimony in a proceeding pending in this State.

Texas. R. Civ. P. 201.2.

III. WITNESS

With the consent of all parties, the plaintiffs seek to commission a competent authority in the State of Texas so that a subpoena *duces tecum* may be served on Rob Dew. According to counsel for the Jones defendants, Mr. Dew has authorized Attorney Pattis to accept service of the proposed subpoena on his behalf. This Court has already once ordered the deposition of Rob Dew, although that deposition was limited to one hour because of its limited purpose in connection with the Jones defendants’ motion to dismiss. Order, Dkt. 234.10, Apr. 30, 2019.

From 2012 until recently, Mr. Dew was one of Alex Jones’s top deputies. Mr. Dew had significant responsibilities within FSS, including serving as News Director and the on-air host of *The Nightly News with Rob Dew*. In connection with those responsibilities, Mr. Dew has, *inter alia*, (1) published statements referring to plaintiff Robbie Parker as an “actor” and indicating that the circumstances surrounding the shooting “stink[] to high heaven,” *see Free Speech*, The Alex

Jones Show (Feb. 12, 2015);² (2) claims to have investigated certain aspects of the Sandy Hook shooting, *see* Dew Dep. at 51-53 (May 16, 2019) (attached hereto at Ex. C); (3) directed the activities of FSS reporter Dan Bidondi who traveled to Newtown and Hartford to “report” on the activities of Sandy Hook hoaxer Wolfgang Halbig, *see* email from R. Dew to D. Bidondi, dated July 7, 2015 (attached hereto at Ex. D); (4) participated in FSS marketing and promotional activities, *see* Dew Dep. at 23-28 (May 16, 2019); (5) testified as a FSS corporate representative in related litigation in Texas.

In May 2019, Mr. Dew was deposed for the limited purpose of establishing the scope of materials and information responsive to the plaintiffs’ discovery requests in connection with the Jones defendants’ motion to dismiss.

Based on discovery received to date, including depositions of current and former FSS employees, it is apparent that Rob Dew is well positioned to testify concerning, *inter alia*, (1) statements FSS published concerning the Sandy Hook shooting, (2) any sources FSS relied upon in connection with those statements; (3) any investigation FSS conducted in connection with the Sandy Hook shooting; and (4) FSS’s marketing and promotional activities. In light of this, Mr. Dew’s testimony and materials in his possession are highly relevant and highly likely to give rise to admissible evidence that will assist in the prosecution and/or defense of the case.

WHEREFORE, the plaintiffs respectfully request that the Court grant this Motion and issue a Commission in the attached form, thus allowing counsel for plaintiffs or their designee to issue a Subpoena *Duces Tecum* directed to the witness described herein pursuant to appropriate process, for all testimony and materials relevant to the subject matter of this case or likely to lead to the

² The Jones defendants have stipulated that FSS published this video on or about February 12, 2015. *See* Ex. E.

discovery of such relevant information.

THE PLAINTIFFS,

By: /s/ Christopher M. Mattei
CHRISTOPHER M. MATTEI
ALINOR C. STERLING
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Fax: (203) 368-3244
JURIS #32250

CERTIFICATION

This is to certify that a copy of the foregoing has been emailed and/or mailed, this day, postage prepaid, to all counsel and *pro se* appearances as follows:

For Alex Emric Jones, Infowars, LLC, Free Speech Systems, LLC, Infowars Health, LLC and Prison Planet TV, LLC:

Norman A. Pattis, Esq.
Cameron Atkinson, Esq.
Pattis & Smith, LLC
383 Orange Street, First Floor
New Haven, CT 06511
P: 203-393-3017
npattis@pattisandsmith.com
catkinson@pattisandsmith.com

For Genesis Communications Network, Inc.

Mario Kenneth Cerase, Esq.
Brignole & Bush LLC
73 Wadsworth Street
Hartford, CT 06106
mcerame@brignole.com
P: 860-527-9973

/s/ Christopher M. Mattei
CHRISTOPHER M. MATTEI
ALINOR C. STERLING
MATTHEW S. BLUMENTHAL

EXHIBIT A

NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. :

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ALEX EMRIC JONES, ET AL. :

ORDER OF COMMISSION

This matter comes before the Court on the motion of the plaintiffs in the above-captioned consolidated matters for leave of judicial authority and an issuance of an Order for Commission pursuant to Connecticut Practice Book § 13-28(a) for the taking of the deposition of Robert Dew.

It is hereby ordered that the motion for issuance of an Order for Commission be allowed and is hereby granted; and, it is further ordered that any appropriate authority in the State of Connecticut or Texas is authorized to issue a deposition subpoena required to compel the attendance of the witness for the taking of said deposition and to produce requested documents.

Dated this _____ day of _____, 2022 at Waterbury, Connecticut.

Hon. Barbara N. Bellis
Connecticut Superior Court

EXHIBIT B

PLEASE CONTACT THE UNDERSIGNED TO CONFIRM APPEARANCE

**TO: Mr. Robert J. Dew
188 Southern Sunset CV
Driftwood, TX 78619-1501**

SUBPOENA AD TESTIFICANDUM

BY THE AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby
commanded to appear **the offices of fibercove, 1700 South Lamar Boulevard, 338, Austin, TX
78704, or otherwise via remote videoconference**, on **Friday, April 8, 2022 at 10:00 AM Eastern
Time (9:00 A.M. Central Time)** or to such day thereafter and within sixty days hereof, to testify what
you know in a certain Civil Action pending in the Connecticut Superior Court between:

ERICA LAFFERTY, ET AL.

Plaintiff

and

DOCKET NO: X06-UWY-CV-18-6046436S

ALEX EMRIC JONES, ET AL.

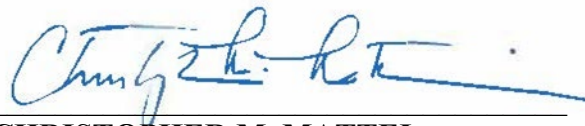
Defendant

AND consolidated matters. You are further commanded to bring with you and produce at the
same time and place the following: **See attached Schedule A for requests for production.**

HEREOF FAIL NOT, UNDER PENALTY OF THE LAW

To any proper officer or indifferent person to serve and return.

Dated at Bridgeport, Connecticut on March 29th, 2022.



CHRISTOPHER M. MATTEI
Commissioner of the Superior Court

Schedule A

Definitions

Please be advised that these Requests for Production use and incorporate the definitions set forth in Conn. Practice Book § 13-1.

In addition, for the purposes of these Requests for Production only,

“Sandy Hook Shooting” is defined as: the shooting that took place at Sandy Hook Elementary School in the town of Newtown, Connecticut on December 14, 2012.

“The plaintiffs in this lawsuit” is defined as: Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Francine Wheeler, David Wheeler, Jennifer Hensel, Jeremy Richman, Donna Soto, Carlee Soto-Parisi, Carlos M. Soto, Jillian Soto, Erica Lafferty, William Sherlach, and Robert Parker.

“Sandy Hook Hoax Theory” is defined as: Any theory that the Sandy Hook Shooting did not happen as is generally accepted, including that it was a government conspiracy, scripted, included so-called “crisis actors,” that the Sandy Hook Victims did not die, and bases for such theories.

“This Lawsuit” is defined as: *Erica Lafferty, et al v. Alex Jones, et al*, UWY-CV18-6046436-S; *William Sherlach v. Alex Jones, et al*, UWY-CV18-6046437-S, and *William Sherlach, et al v. Jones, et al*, UWY-CV18-6046438-S.

“The Texas Lawsuits” is defined as: *Neil Heslin v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001835; *Leonard Pozner and Veronique de la Rosa v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001842; *Scarlett Lewis v. Alex E. Jones, et al*, Cause No. D-1-GN-18-006623, *Marcel Fontaine v. Alex E. Jones, et al*, Cause No. D-1-GN-18-001605; *Brennan M. Gilmore v. Alexander E. Jones, et al*, Case No. 18-00017 (D. W.Va.).

Unless otherwise specified, the time frame for these discovery requests is **December 14, 2012 through and including April 7th, 2022.**

1. Any and all non-privileged communications to or from Wolfgang Halbig, including letters, memoranda, emails, text messages, SMS messages, instant messages sent and/or received over any social media platform, or other electronic communications;

Schedule A

2. Any and all non-privileged communications to or from Daniel Bidondi, including letters, memoranda, emails, text messages, SMS messages, instant messages sent and/or received over any social media platform, or other electronic communications;

3. For the period 2015 through February 21, 2022, any and all non-privileged communications to or from the deponent's uncle, John Dew, including letters, memoranda, emails, text messages, SMS messages, instant messages sent and/or received over any social media platform, or other electronic communications concerning the Sandy Hook Shooting, the Sandy Hook Hoax Theory, the plaintiffs in this lawsuit, this Lawsuit, the Texas Lawsuits any proceeding or hearing of the Newtown Board of Education, Wolfgang Halbig, and/or Dan Bidondi;

4. Any and all non-privileged communications to or from Alex Jones, David Jones, Melinda Flores, Lydia Zapata-Hernandez, Anthony Gucciardi, Adan Salazar, Nico Acosta, Cristopher Daniels, Timothy Fruge, Blake Roddy, Louis Sertucche, Buckley Hamman, Michael Zimmerman and/or Owen Shroyer, including letters, memoranda, emails, text messages, SMS messages, instant messages sent and/or received over any social media platform, or other electronic communications concerning this Lawsuit, the Texas Lawsuits, Robert Jacobson, Nico Acosta, and/or the deponent's termination of employment with Free Speech Systems, Inc.

5. Documents sufficient to identify any and all e-mail addresses, cellular telephone numbers, and social media accounts utilized by the deponent.

6. Any and all documents concerning the termination of the deponent's employment with Free Speech Systems, LLC, including, but not limited to, any severance or other benefits provided to you in connection with that termination.

EXHIBIT C

ERICA LAFFERTY, ET AL. V. ALEX EMRIC JONES, ET AL.
Robert Dew on 05/16/2019

1 NO. X06-UWY-CV-18-6046436S
2 NO. X-06-UWY-CV-18-6046436S) SUPERIOR COURT
3 ERICA LAFFERTY, ET AL.)
4 V.) COMPLEX LITIGATION DOCKET
5 ALEX EMRIC JONES, ET AL.) AT WATERBURY
6 MAY 6, 2019

7 NO. X-06-UWY-CV18-6046437-S) SUPERIOR COURT
8 WILLIAM SHERLACH) COMPLEX LITIGATION DOCKET
9 V.) AT WATERBURY
10 ALEX EMRIC JONES, ET AL.) MAY 6, 2019

11 NO. X06-UWY-CV-18-6046438S) SUPERIOR COURT
12 WILLIAM SHERLACH, ET AL.) COMPLEX LITIGATION SUPPORT
13 V.) AT WATERBURY
14 ALEX EMRIC JONES, ET AL.) MAY 6, 2019

15 *****

16 ORAL AND VIDEOTAPED DEPOSITION OF
17 ROBERT DEW
18 MAY 16, 2019

19 *****
20 ORAL AND VIDEOTAPED DEPOSITION OF ROBERT DEW, produced as a
21 witness at the instance of the Plaintiffs, and duly sworn, was
22 taken in the above-styled and numbered cause on the 16th day of
23 May, 2019, from 8:35 a.m. to 10:03 a.m., before AMBER KIRTON, CSR
24 in and for the State of Texas, reported by machine shorthand, at
25 the offices of Ken Owen & Associates, 801 West Avenue, Austin,
Texas.

1 talk.

2 Q. Somebody would just have to intuit that Alex wanted a
3 coffee break and then they would just go to the Website?

4 A. Well, I wouldn't call it a coffee break. I'd call it a
5 sip. But yeah. And then there are other times if -- I think --
6 yeah.

7 Q. Okay.

8 A. The process has changed over the years so it's --

9 Q. I mean, that still occurs, correct?

10 A. Uh-huh. We still go to the -- we still show the
11 Website.

12 Q. Right. During your time at Free Speech Systems you've
13 been personally involved in Free Speech Systems' marketing
14 efforts, correct?

15 A. What do you mean by marketing efforts?

16 Q. You know what marketing is, don't you, sir?

17 A. I know what -- I know what marketing is.

18 Q. Yeah. You've been personally involved in that at Free
19 Speech Systems, right?

20 A. In terms of creating commercials or editing
21 commercials?

22 Q. Any marketing activity of any kind, you've been
23 involved in that at Free Speech Systems, correct, sir?

24 A. I mean, I've made --

25 Q. Yes or no?

1 MR. PATTIS: If you can answer it with a yes or
2 no. If you can't, don't.

3 A. I've been involved with marketing activities.

4 Q. (BY MR. MATTEI) Was that hard for you to say that?

5 A. No.

6 Q. Okay. Because you actually swore under oath that you
7 are familiar with the marketing efforts made by Free Speech
8 Systems from 2012 all the way to the current day, correct?

9 A. Uh-huh. You're asking me to think about a long time
10 period and, I mean, I'm sure -- do you know what you were doing
11 in December of 2012?

12 Q. No, but you do, though, because you've already
13 testified under oath to that effect.

14 A. Okay.

15 Q. Right?

16 A. What, that I know everything that I was doing since
17 2012?

18 Q. No, that you've been involved in marketing with Free
19 Speech Systems and you've been familiar with the marketing
20 practices of Free Speech Systems from 2012 to current day.
21 Correct?

22 MR. PATTIS: I'm going to object as to form.
23 Being involved with and familiar is compound.

24 Q. (BY MR. MATTEI) Why don't you grab your affidavit,
25 sir? This is Exhibit 17.

1 MR. PATTIS: Thank you. Chris, if I may.

2 Mr. Dew, from time to time you're saying uh-huh or huh-uh. Say
3 yes or no so the record is clear, okay?

4 THE WITNESS: All right.

5 Q. (BY MR. MATTEI) And if you look at Paragraph 2. Am I
6 correct, sir, that you swore under oath that you are familiar
7 with the marketing efforts made by Alex Jones and the Alex Jones
8 Show during that time and subsequently, that is, from 2012
9 onward?

10 A. Uh-huh.

11 Q. Right.

12 MR. PATTIS: That would be a yes. I don't mean to
13 be rude.

14 THE WITNESS: Yes.

15 Q. (BY MR. MATTEI) Thank you. And you've been personally
16 involved in standard marketing and analytics regarding product
17 sales and promotions while at Free Speech Systems; is that
18 correct?

19 MR. PATTIS: That is compound. I'm going to
20 object as to the form.

21 Q. (BY MR. MATTEI) You can answer it.

22 MR. PATTIS: If you can. It's two questions at
23 once.

24 A. If I was involved with majority of what?

25 Q. (BY MR. MATTEI) Products sales -- personally involved

1 in standard marketing and analytics concerning product sales,
2 correct?

3 MR. PATTIS: Objection as to the form. It's
4 compound.

5 A. I have not been involved in analytics.

6 Q. (BY MR. MATTEI) You have not been involved in
7 analytics throughout your time at Free Speech Systems?

8 A. Well, what would you define as analytics?

9 Q. Do you understand --

10 A. Looking at a view count on YouTube? I've looked at
11 view counts on YouTube.

12 Q. Okay.

13 A. That's -- that's probably what I did most was look at
14 view counts on YouTube.

15 Q. Okay. So that's when Free Speech Systems posts a video
16 on YouTube that has a number of views associated with it and
17 that's what you've done as far as your involvement with
18 analytics, correct?

19 A. That's correct.

20 Q. Okay. So you haven't been involved in any analytics
21 regarding product sales, correct?

22 A. No.

23 Q. And you haven't been involved in any analytics
24 regarding promotions, correct?

25 A. Yeah. No, I haven't.

1 Q. Okay. Have you been personally involved in standard
2 marketing regarding product sales?

3 A. In terms of creating, like, which products to put on
4 sale? Is that what you're asking?

5 Q. I guess what I'm asking you is -- I mean, obviously
6 Free Speech Systems markets its products, right, the products
7 that it sells in the store, right?

8 A. Uh-huh.

9 Q. Yes?

10 A. Yeah.

11 Q. It does that in a variety of ways, correct?

12 A. Correct.

13 Q. One of the ways it markets its product is that Alex
14 Jones pitches them during a show, correct?

15 A. Uh-huh.

16 Q. Okay. Have you been involved in that particular type
17 of marketing at Free Speech Systems, promoting the products on
18 the show?

19 A. No.

20 Q. Okay. One of the ways that Free Speech Systems
21 promotes its products is that it features them in advertisements
22 on its Website, correct?

23 A. As a -- yeah, as a graphical ad.

24 Q. Correct. Do you -- are you involved in creating those
25 ads at all?

1 A. No.

2 Q. Have you ever been?

3 A. No.

4 Q. Okay. Have you ever been involved in deciding which
5 products to feature or advertise on InfoWars dot-com?

6 A. No.

7 Q. Okay. Have you -- another way that Free Speech Systems
8 markets its products is through its newsletter, correct?

9 A. I believe there is ads in the newsletter, yes.

10 Q. Are you involved in that in any way?

11 A. No.

12 Q. Okay. Are there any other marketing activities
13 relating to product sales that I haven't mentioned that you --
14 that you participate in?

15 A. Editing ads, editing video ads.

16 Q. You edit video ads that promote products?

17 A. Uh-huh. I've done that.

18 Q. Describe that for me. What does that involve?

19 A. Usually taking shots of the product with a voiceover
20 and editing them together.

21 Q. And -- and how then are they conveyed to the public?

22 A. That airs during an ad break.

23 Q. Okay. And so what you've described is basically a
24 video editing, correct?

25 A. Uh-huh.

1 MR. MATTEI: And then we'll come back and let
2 you --

3 MR. PATTIS: Just with Alinor?

4 MR. MATTEI: Just with Alinor.

5 THE VIDEOGRAPHER: Off the record at 9:46 a.m.

6 (Break was taken from (9:46 a.m. to 9:53 a.m.)

7 THE VIDEOGRAPHER: We're on the record at 9:53
8 a.m.

9 Q. (BY MR. MATTEI) Mr. Dew, prior to the break you
10 testified that one of the things you did to independently
11 investigate the Sandy Hook shooting was to listen to recordings
12 of 911 transmissions, correct?

13 A. Uh-huh.

14 Q. Did you do anything else?

15 A. Well, people would send us leads so I'd look at those.
16 You know, email -- email tips. You know, if it was an article
17 I'd print it out, show it to Alex. I mean, the only other -- the
18 only other thing that pops in my head is talking to my uncle who
19 went to some local board meeting they had.

20 Q. Okay. Let me first ask you about these -- these leads.
21 So people would either call in to Free Speech Systems or email
22 tips concerning Sandy Hook, correct?

23 A. If they called I would say they called into the show
24 live.

25 Q. Okay. And did you ever attempt to independently

1 investigate any tips received by Free Speech Systems concerning
2 Sandy Hook?

3 A. Well, I would say most of the tips were either an
4 article or a video clip somewhere. So, I mean, there is not
5 much -- if -- if the video clip say of the helicopter aerial
6 shots, you know, you look at it, it looks like Sandy Hook school.
7 You assume that that was the day of. There is cops walking
8 around the school. So I don't know how much investigating you do
9 in a circumstance like that. Most of them are either for
10 articles or, you know, like, local newsclips.

11 Q. Okay. We'll deal with those in a second. For tips
12 that were not either article or local -- articles or local
13 newsclips, to the extent you received any of those, did you do
14 anything to investigate any of them?

15 A. I don't -- I don't remember investigating anything that
16 wasn't either an article or a video clip.

17 Q. Okay. With regard to articles and video clips, did you
18 independently investigate the information set forth in any of
19 those?

20 A. Like I said before, if it was -- if it had -- if it was
21 an article that had links you'd drill through the links to see
22 where they went, see if it went to a source document. That was
23 something, you know, we'd look at whether it had a source
24 document or not. So -- and then the video clips were -- were
25 mostly local news coverage that people had clipped out and

1 either, you know, shot on their TV or clipped it out and put it
2 on social media somehow.

3 Q. And you accepted those video clips for what they
4 purported to be?

5 A. Uh-huh.

6 Q. Okay. And the articles that you received, the only
7 independent investigation you did with the information set forth
8 there was get a primary document was somehow associated with it
9 or linked to it, correct?

10 A. Yeah, and it would depend on what the -- I guess the --
11 what the article was saying.

12 Q. Okay. And you said you talked to your uncle. Your
13 uncle is a retired FBI agent, correct?

14 A. Correct.

15 Q. He lives in New Jersey?

16 A. Correct.

17 Q. Okay. Do you have an address for him?

18 A. Not off -- I don't know it by heart.

19 Q. Okay. All right. You testified that one of Free
20 Speech Systems' goals is to put out -- put out information?

21 A. Uh-huh.

22 Q. Right? Why -- so before I ask you about that. Am I
23 correct that before June of 2018 there were no written
24 journalistic standards at Free Speech Systems?

25 A. I would say that's correct.

1 Defendants for examination, signature and return to Huseby Global
2 Litigation by June 10, 2019;

3 That the amount of time used by each party at the deposition
4 is as follows:

5 Mr. Christopher M. Mattei - 01 hour(s): 10 minute(s)
Mr. Norman Pattis - 00 hour(s): 00 minute(s)
6 Ms. Kristen A. Jakiela - 00 hour(s): 00 minute(s)
Ms. Claire Pariano - 00 hour(s): 00 minute(s)
7

8 That pursuant to information given to the deposition officer
9 at the time said testimony was taken, the following includes all
10 parties of record:

11 Mr. Norman Pattis & Ms. Alinor C. Sterling, Attorneys for
Plaintiffs
12 Mr. Norman Pattis, Esq, Attorney for Alex Emric Jones,
InfoWars, LLC, Free Speech Systems, LLC, InfoWars Health, LLC and
13 Prison Planet TV, LLC
Ms. Kristen A. Jakiela, Attorney for Cory T. Sklanka
14 Ms. Claire Pariano, Attorney for Midas Resources, Inc.

15 I further certify that I am neither counsel for, related to,
16 nor employed by any of the parties or attorney in the action in
17 which this proceeding was taken, and further that I am not
18 financially or otherwise interested in the outcome of the action.

19

20

21

22

23

24

25

1 Certified to by me this 21st day of May, 2019.

2

3



4

Amber Kirton, CSR

Expiration Date: 12/31/19

Firm #660

5

Huseby Global Litigation

1230 West Morehead Street, Suite 408

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Charlotte, NC 28208

(800) 333-2082

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EXHIBIT D

From: Rob Dew <robd@infowars.com>

To: Dan Bidondi <truthradio990@hotmail.com>

Subject: Re: BIDONDI- MOS QUESTIONS

Date: 2015-07-07 06:07:43 +0000

Dan -- The MOS will be old by the time we can air it

Go to Sandy Hook -- we will cover that

Rob

----- Original Message -----

From: "Dan Bidondi"

To: "Rob Dew"

Sent: Friday, July 3, 2015 1:37:17 PM

Subject: BIDONDI- MOS QUESTIONS

Hey Rob, can I do an MOS tomorrow?

I wanted to hit up the Bristol Day 4th of July Parade, it's the countries oldest and longest running 4th of July Parade celebration.

Questions: Any you want to ad or take out let me know

1- What holiday are we celebrating today?

2- What country did we defeat to gain our Independece?

3- In what year did we declare Independence?

4-What is the name of the document that was signed on this date?

5- Can you name any of the Founding Father's that signed the Declaration of Independence?

6- According to our Constittution, who gives us our rights?

A: The Government B: The Military

C: We The People or D: Obama

7- How many stars are on the flag?

8- How many strips?

9- Islamic Leader Louis Farrakhan recently stated that the American Flag needs to be put down. Do you agree with that or not, your thoughts?

10- What is your thought about people burning and stomping on the American Flag?

11- Do you think the Confederate Flag should be banned, and do you think that banning this flag is an attack on the 1st Amendment?

EXHIBIT E

NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. :

NO. X06-UWY-CV-18-6046437-S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. :

NO. X06-UWY-CV-18-6046438-S : SUPERIOR COURT
WILLIAM SHERLACH, ET AL. : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. :

STIPULATION REGARDING AUTHENTICATION

On March 15, 2022, Alex Jones, Free Speech Systems, LLC, Infowars, LLC, Infowars Health LLC, Prison Planet TV, LLC (the “Jones defendants”) and the plaintiffs agree and stipulate to the following:

1. All communications (including but not limited to emails, letters, texts) produced by any Jones defendant in this litigation to which Alex Jones, or any current or former employee of any of the corporate Jones defendants is a party, are authenticated as being true and accurate copies of communications created, sent or received by FSS.

2. All other documents produced by any Jones defendant in this litigation satisfy Conn. Code of Evidence 8-4, in that they are admitted to be authentic copies of records made or kept by the producing defendant in the regular course of business, and that it was the regular course of the producing defendant's business to make or keep such record at the time such record was made or kept.

3. All videos produced by any Jones defendant in this litigation, as listed in attached Chart A, are true and accurate copies of videos that FSS published or otherwise broadcast on or about the dates listed in Chart A.

4. The Jones defendants do not dispute that all videos produced by the plaintiffs to the Jones defendants, as listed in attached Chart B, are true and accurate copies of videos that FSS published or otherwise broadcast on or about the dates listed in Chart B.

EXHIBIT A

Chart A

Title	Upload Date	ID	Name of File Produced
Creepy Illuminati Message in Batman Movie Hints at Sandy Hook School	2012.12.17	F2mRuEhmoGA	17_F2mRuEhmoGA
Sandy Hook 2nd Shooter Cover-Up	2012.12.19	6W6b-voc-Ds	07_6W6b-voc-Ds
Sandy Hook Father Remembers Fallen Hero	2012.12.19	8cZkHDHl6nQ	09_8cZkHDHl6nQ
Lower Part of Gotham Renamed "Sandy Hook" in Dark Knight Film	2012.12.21	Fus1FpQiU-Q	18_Fus1FpQiU-Q
Expert: Violence on TV and Video Games Cause of Sandy Hook Massacre	2012.12.22	7CfulOdIsUM	08_7CfulOdIsUM
Prof. Claims Sandy Hook Massacre MSM Misinformation	2013.01.10	D8GxrKJDSL8	14_D8GxrKJDSL8
Sandy Hook AR-15 Hoax? Still No School Surveillance Footage	2013.01.15	Oo74myC3bqY	30_Oo74myC3bqY
Why People Think Sandy Hook is A Hoax	2013.01.27	tM5ZdO-IgEE	36_Tm5Zdo-IgEE
Children of Sandy Hook To Perform At Super Bowl	2013.02.02	U8r7VMuJGAk	37_U8r7VMuJGAk
Dr. Steve Pieczenik: Sandy Hook was A Total False Flag!	2013.03.07	5EfyD7Wu5fQ	05_5EfyD7Wu5fQ
Crisis Actors Used at Sandy Hook! Special Report	2013.04.01	shQSVhS0hLw	33_shQSVhS0hLw
Sandy Hook Police Ordered to Stand Down?	2013.11.23	xP9fhKUaudio	41_xP9fhKUaudio
Sandy Hook Mom: BACKGROUND CHECKS WOULDN'T HAVE PREVENTED TRAGEDY	2013.12.05	h90tRnub9_8	20_h90tRnub9_8
Sandy Hook Investigator Stonewalled and Threatened	2014.02.20	oGpWtqdiSCY	29_oGpWtqdiSCY
Sandy Hook, False Narratives Vs. The Reality	2014.03.14	eslvAO2allw	16_eslvAO2allw
Revealed: Sandy Hook Truth Exposed	2014.05.09	_rSLOYCHNdW	02_rSLOYCHNdW
Sandy Hook "Officials" Caught In Coverup And Running Scared	2014.05.13	MH6hml1h-iQ	25_MH6hml1h-iQ
Bombshell: Sandy Hook Massacre Was A DHS Illusion Says School Safety Expert	2014.05.13	x2a1FwYEZS4	40_x2a1FwYEZS4
Sandy Hook Red Flags Ignored By Newtown School Board	2014.05.14	YiXpr30oUkA	42_YiXpr30oUkA
Sandy Hook Deaths Missing From FBI Report	2014.09.25	A2Z0zUZBn7k	10_A2Z0zUZBn7k
Sandy Hook Film Censorship Efforts Backfire	2014.12.12	4T8_WYzH5SM	03_4T8_WYzH5SM

The Ultimate Sandy Hook Debate As The 2nd Anniversary Looms	2014.12.12	6aK0P-WxjU8	06_6aK0P-WxjU8
Will Bushmaster Lawsuit Reveal Sandy Hook Hoax?	2014.12.16	BFyDqDLAcLQ	12_BFyDqDLAcLQ
Lawsuit Could Reveal Truth About Sandy Hook Massacre	2014.12.27	kK8CnIBA928	23_kK8CnIBA928
New Bombshell Sandy Hook Information In-Bound	2015.03.04	_7ib5WkULBY	01_7ib5WkULBY
New Sandy Hook Questions Arise from FOIA Hearing	2015.05.28	5cll79t7Mrw	26_Ml3KVj2nVRA
Sandy Hook: The Lies Keep Growing - Infowars Nightly News - 05/28/2015	2015.05.29	MI3KVj2nVRA	04_5cll79t7Mrw
School Administrator Exposes Sandy Hook Stonewall	2015.05.29	SO8Xb-t4nT4	34_SO8Xb-t4nT4
Official Claims DHS Involved in Sandy Hook	2015.06.04	BWsbyH2Wa0E	13_BWsbyH2Wa0E
Retired FBI Agent Investigates Sandy Hook: MEGA MASSIVE COVER UP	2015.07.07	jCOe3qlgyFA	21_jCOe3qlgyFA
The Fight for Freedom of Information in Sandy Hook.	2015.07.08	l0miXJ-djeA	24_l0miXJ-djeA
Alex Jones Final Statement on Sandy Hook	2016.11.18	MwudDfz1yAk	27_MwudDfz1yAk
Sandy Hook Vampires Exposed	2017.04.22	rUn1jKhWTXI	32_rUn1jKhWTXI
Media Refuses To Report Alex Jones' Real Statements On Sandy Hook	2017.06.13	kf2F7RxJ9e4	22_kf2F7RxJ9e4
Alex Jones: Responds To Sandy Hook Anti Free Speech Lawsuit	2018.04.17	GMGdN648qgU	19_GMGdN648qgU
Full Show - Alex Jones' Full Statement On Frivolous Sandy Hook Lawsuit	2018.04.17	QjjClhASs0c	31_QjjClhASs0c
Democrats File Suit To Overturn 2016 Election As Megyn Kelly Re Opens Sandy Hook Wounds	2018.04.20	sYFDfk_O8xE	35_sYFDfk_O8xE
Watch As Megyn Kelly Opens Old Wounds Of Sandy Hook Victims	2018.04.20	uQkAJykqyeo	38_uQkAJykqyeo
MSM Continues To Demonize Alex Jones Over Sandy Hook Lawsuits	2018.04.20	V2Lw3fRTQko	39_V2Lw3fRTQko
Alex Jones' Statement On New Sandy Hook Lawsuit	2018.05.23	AfvhhcXPCps	11_AfvhhcXPCps
Full Show – SOROS LAWFARE EXPOSED: Phony Sandy Hook Lawsuits Filed By FBI Agent And Families	2018.05.23	dWJph5Dk3W4	15_dWJph5Dk3W4
Alex Jones Responds To Morgan Freeman, Harvey Weinstein, And Sandy Hook Controversy	2018.05.25	nwCCesazmgM	28_nwCCesazmgM

EXHIBIT B

Chart B

Title	Date	Source
Connecticut School Massacre Looks Like False Flag Says Witnesses	2012.12.14	The Alex Jones Channel (YouTube)
Sandy Hook Mass Media Psyop - Outtakes and Bloopers	2012.12.17	Embedded inside 2013.01.08 Infowars.com article "College Professor Says 'Crisis Actors' May Have Played Part if Sandy Hook Was Indeed a Hoax"
Callers React to Foreign Media Pushing Total Gun Confiscation	2013.01.04	Infowars.com
Obama Gun Grab Psyop	2013.04.09	Infowars
Shadow Gov't Strikes Again at Boston Marathon	2013.04.16	Infowars.com
Robbie Parker CNN press conference aired 12-15-2012 5:21pm EST	2014.03.16	Justice for Sandy Hook
FBI Says Nobody Killed at Sandy Hook Massacre ft. Wolfgang Halbig	2014.09.25	The Alex Jones Radio Show
AirAsia Jet Missing	2014.12.28	The Alex Jones Radio Show
Ron Paul - Kurt Haskell	2015.01.13	The Alex Jones Show
Free Speech	2015.02.12	The Alex Jones Show
Full Show - Government Is Manufacturing Crises - 07/07/2015	2015.07.07	Infowars
<i>Untitled Broadcast</i>	2016.11.17	The Alex Jones Show
Alex Jones Under Attack	2016.11.28	The Alex Jones Channel
<i>Untitled Broadcast</i>	2017.03.08	The Alex Jones Show
Alex Jones Warns Megyn Kelly, Exposes Psychological Warfare Operation	2017.06.12	Infowars
<i>Untitled Broadcast</i> - Pre- & Counter-NBC Programming re Megyn Kelly Interview	2017.06.18	Infowars
Zero Hedge Discovers Anomaly In Alex Jones Hit Piece	2017.06.26	The Alex Jones Show and the Alex Jones Radio Show
JFK Assassination Documents to DROP Tonight (FULL SHOW)	2017.10.26	Infowars
Watch Bernie Sanders Run From Alex Jones At LAX Airport	2018.06.04	The Alex Jones Channel
MSM Spreads More Spin Stories About Infowars' Twitter Account	2018.08.10	Infowars

Alex Jones Has Respectful Message For Sandy Hook Parents	2018.08.12	Infowars
Facebook Says They're Watching Users in Their Homes + Tanker Attack False Flag - 6/14/2019	2019.06.14	Infowars.com
Guilty Until Proven Guilty! Deep State-Controlled Court Denies Alex Jones Trial by Jury! - FULL SHOW 111521	2021.11.15	Infowars
Alex Jones Responds to Connecticut Default in Sandy Hook Case	2021.11.15	Infowars
Alex Jones Responds to the Weaponization of the Courts in the Sandy Hook Default Ruling	2021.11.15	Infowars
Alex Jones Statement on Default Judgement in CT Sandy Hook	2021.11.15	Infowars
<i>Untitled Broadcast</i>	2021.11.16	Infowars
Deep State Launches Martial Law Through Judicial Tyranny	2021.11.16	Infowars
The Case for Alex Jones	2022.02.22	Posted on Infowars.com